



Representative Legal Matters

Thanh Vinh Nguyen

- Assisted major automotive companies in petitions to court against customs valuation assessments.
- Advised a leading online travel and tour company on licensing, corporate, tax matters, and regulations in Vietnam
- Advised a leading e-commerce company on company establishment and the permanent establishment tax ramifications in relation to their proposed business operations in Vietnam.
- Assisted a multinational consumer goods company in revisiting the sustainability of the business model in light of the current regulations.
- Advised world leading e-commerce and digital services on e-commerce tax and assisted clients in dealing with their local partners in relation to their Vietnam tax liabilities.
- Assisted a multinational corporation in drafting and negotiating the transfer agreement with respect to taxation related to a transfer of capital, and preparing and filing the notification for tax treaty protection in relation to an exemption of capital gains tax of USD 5.8 million.
- Assisted the client in restructuring the transfer pricing rule from Resale Minus on average across all products" to "Resale Minus on a product-by-product basis" and in analyzing impact on customs valuation.
- Assisted multinational automotive manufacturer in establishing strategy and arguments to defend the client's position against customs authority decision, and represented the client in the settlement process.
- Advised a trading company on relevant tax regulations, tax inspection and tax appeals.
- Received a mandate from the World Bank to assist the Vietnamese Government in developing an auction mechanism for the solar industry in Vietnam.
- Advised waste management solutions provider regarding VAT treatment of their main business activities and other issues under its contract with the Government.
- Assisted a leading global e-commerce company and advised on permanent establishment risk in relation to their proposed business operations in Vietnam from both a legal and practical perspective
- Assisted a leading multinational footwear company in analysing the tax incentives that may be applicable to their new project in Vietnam and other tax implications that make an impact on their proposed business structure.
- Assisted an Asian brewery in analysing the tax implications on their proposed business

structure, with particular regard to excise tax.

- Advised a large oil & gas company regarding a potential assessment of capital gain tax on their sales of shares relating to their operation in Vietnam.
- Advised a multinational energy company regarding a potential assessment of capital gains tax on their indirect sales of shares relating to their operation in Vietnam.
- Conducted tax planning for a multinational company in the retail sector for their divestment from Vietnam.
- Assisted a multinational conglomerate in a tax case against the local tax authority who retroactively applied a differential tax assessment claiming tax incentives were granted by the licensing authority in contradiction with the laws.
- Advised an investment fund on capital gains tax issues for an offshore share purchase transaction. Assisted in identifying the tax implications on the transaction structure and how to deal with these issues in negotiation with the purchaser.
- Advised and assisted a leading European retailer in dealing with their counter party's claim of breach of tax representations and warranties.
- Advised a foreign PE fund in relation to capital gains tax issues for an offshore share purchase transaction. Also provided tax-planning advice on a divestment in the education section.
- Advised an online travel agent on the establishment of operations in Vietnam. Advised the client on market entry to Vietnam, both in terms of the regulatory requirements and restrictions and tax implications, especially in relation to their new business model.
- Advised a leading e-commerce and digital services MNC in relation to its entry into the Vietnam market.
- Assisted a leading global healthcare products company on their acquisition of a 100% equity interest of a non-public joint stock company manufacturing and trading pharmaceutical and food supplement products.
- Advised a multinational technology company on market entry legal requirements and general corporate tax.
- Assisted four shipping companies in preparing a position paper for submission to various ministries to address the cumbersome procedure of claiming tax exemption with respect to freight tax under the tax treaties.
- Assisted a tire manufacturer in tax, market access, trade, personnel movement, construction and customs matters. This deal demonstrates our experience in dealing with major and complex projects in the post-WTO and pre-TPP legal environment.
- Assisted a diversified holding company (in relation to a dispute on claiming input VAT credit with respect to import VAT of their local distributor.
- Assisted a multinational tobacco manufacturing company in its tax dispute against an assessment of USD 5.4 million including income tax, penalty and interest and won the case.
- Assisted the client in addressing their local partner's concerns regarding the local partner's responsibility to withhold tax on payments made through the local partner's digital platform in relation to e-commerce activities. The tax proposed to be withheld would negatively impact the client's business in Vietnam.
- Assisting an international development and real estate holding company specializing in integrated resorts in reviewing and commenting on the draft legislative framework and tax

issue of the gaming business. This work involves addressing the tax issues for a new business line in Vietnam, which draws international practice and experience into consideration.

- Advising a major player in design, provision and operation of sustainable water management solutions with respect to its provision of engineering, procurement, and construction of a water treatment plant in Vietnam.
- Advising a multinational company on restructuring of R&D functions and tax planning.
- Advising a world leading fashion brand on legal and tax issues for market access in Vietnam.
- Advised a car manufacturer in disputes on customs classification.
- Assisted the client in a tax case against the local tax authority who assessed corporate income tax due to transfer pricing adjustment.
- Advising a real estate developer on tax structures and planning for a merger & acquisition deal.
- Advising several construction companies on regulatory, licensing and tax issues related to performance of projects in Vietnam.
- Assisting a large integrated resort project in tax planning and tax appeal against a value added tax assessment.
- Representing a multilevel sale company in the tax appeal against an enterprise income tax assessment.
- Representing a leading multinational electronics products company in defending against allegations of tax evasion by the customs authorities.
- Representing a multinational garment company in defending against allegations of tax evasion by the customs authorities.
- Assisting a multinational bank on withholding tax issues and application of tax treaties.
- Advising a multinational courier express company on Vietnamese tax issues related to agents' operation.
- Advising a telecommunication company on Vietnamese tax issues related to its bidding and providing services in Vietnam.